

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

X

Mondaire Jones, et al.,
*individually, and on behalf of all others
similarly situated,*

Docket No. 20-cv-6516-VM

Plaintiffs,

DECLARATION OF SHANNON SPENCER

V.

United States Postal Service, et al.,
Defendants.

X

COUNTY OF JACKSON)
STATE OF NORTH CAROLINA) ss.:)

I, SHANNON SPENCER, being duly sworn, depose and say:

1. I am a Plaintiff in this matter, and I base all of the below on my personal knowledge.
2. I am a resident of Collegeville, Pennsylvania but am handling estate issues for my parents' estate in Virginia which require me to be physically present in Virginia for much of the fall.
3. Voting every year is very important to me and I am an active voter in primary and general elections. Not voting in a presidential election year is not acceptable to me, particularly in this year, the 100th anniversary of the 19th Amendment to the US Constitution granting women the right to vote.
4. The current pandemic causes me great concern for my own health and the health of the people in my family and I am concerned about the safety of exposure to coronavirus in polling locations.

5. My plan had been to vote using Pennsylvania's mail-in ballot option, sent through the USPS. However, slowdown of mail at the USPS, is being widely reported.^{1 2 3} This makes me very concerned about whether a ballot that my Board of Elections would have to mail to me via the USPS⁴ and then I would have to mail back (a second trip through the USPS system) would arrive on time.

6. Because I do not have any way to ensure that my ballot doesn't get lost or delayed in the USPS system, I now plan to vote in person. I will do this by returning to Pennsylvania and voting either at the polls on November 3, 2020 or by going to my local Board of Elections office to pick up a ballot, vote the ballot and hand it back in, in person or in a drop box. Either option will require an otherwise unnecessary trip from Virginia to Pennsylvania and an unnecessary potential exposure to the 2019 novel coronavirus. I believe this exposure is a profound cost, and it is something I would not otherwise risk.

As permitted in 28 U.S.C § 1746, I, Shannon Spencer, declare that, under penalty of perjury that the foregoing is true and correct.

Executed On: September 10, 2020



Shannon Spencer

¹ Available at: <https://www.theguardian.com/business/2020/aug/16/usps-mail-delays-postmaster-general-changes-workers>

² Available at: <https://www.cnn.com/2020/09/01/politics/usps-mail-delays-election-2020/index.html>

³ Available at: <https://www.cnet.com/how-to/usps-crisis-why-mail-is-delayed-what-that-means-for-the-election-and-whats-being-done-about-it/>

⁴ Available at: <https://www.montcopa.org/753/Voter-Services>